

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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CITLAND LIMITED,	:
	:
Plaintiff,	: Civil Action No.: 09-CV-3797 (ADS)(ARL)
	:
-against-	: REPLY DECLARATION IN FURTHER
	: SUPPORT OF PLAINTIFF'S
INTERNATIONAL TOBACCO PARTNERS,	: <u>STATEMENT OF ATTORNEYS' FEES</u>
LTD,	:
Defendant.	:
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Donald R. Dunn, Jr. hereby declares the following under penalty of perjury:

1. I am an associate attorney of Seyfarth Shaw LLP, counsel to plaintiff Citland Limited ("Citland"). I submit this Reply Declaration in further support of Citland's statement of its attorneys' fees to be awarded pursuant to the Decision and Order of this Court dated March 27, 2010, granting Citland's motion to recover its attorneys' fees and disbursements incurred in connection with (i) pursuing a default judgment against defendant International Tobacco Partners, Ltd. ("ITP") and (ii) opposing ITP's motion to vacate that default (the "Fees Order"). I have personal knowledge of the facts set forth herein unless otherwise specified.

2. Citland's statement in support of its attorneys' fees was supported by the Declaration of my colleague, Mark Ginsberg, in his Declaration dated April 15, 2010 (the "Ginsberg Declaration").¹

3. The Ginsberg Declaration correctly identified the annexed copies of all Seyfarth Shaw invoices "in this matter." Ginsberg Declaration ¶ 2. That submission, however, incorrectly annexed invoices exceeding the scope of attorneys' fees awarded in the Fees Order,

¹ Mr. Ginsberg submitted that Declaration because I was unable to do so; I ruptured my Achilles tendon on April 11, 2010, had surgery to repair same on April 19, 2010 and was out on medical leave until May 5, 2010.

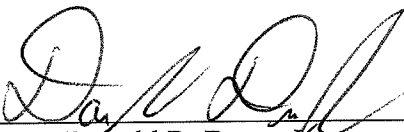
which confined itself to fees incurred in connection with pursuing a default judgment against ITP and opposing ITP's motion to vacate that default.

4. Annexed hereto as Exhibit A are true and correct copies of invoices and time billing entries -- with unrelated or privileged material redacted -- relating to Citland's fees and costs incurred in connection with pursuing a default judgment against ITP and opposing ITP's motion to vacate that default. These attorneys' fees total \$15,236.50 and these costs and disbursements total \$419.07.

5. Annexed hereto as Exhibit B are biographies for the three attorneys whose time entries appear on the subject invoices.

6. Accordingly, we respectfully request that the Court enter judgment against ITP and in favor of Citland in the amount of \$15,655.57 or in any lesser amount deemed by the Court to be just and proper.

Dated: New York, New York
May 17, 2010



Donald R. Dunn, Jr.